From: ANDERSON Jim M
To: HOPE Bruce

Cc: Eric Blischke/R10/USEPA/US@EPA

Subject: FW: Identification of Outstanding Issues for 5/23/06 Portland Harbor Managers Meeting on R2 Reporting

 Date:
 06/05/2006 08:18 AM

 Attachments:
 ERAFrameworkStatus.doc ModelingProgress.doc

Bruce

I was cleaning-up some older e-mails & wasn't sure you got this one.

James M. Anderson DEQ Northwest Region Portland Harbor Section Phone (503) 229-6825 Fax (503) 229-6899

----Original Message---From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Wednesday, May 24, 2006 8:41 AM
To: Shephard.Burt@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov;
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Subject: Fw: Identification of Outstanding Issues for 5/23/06 Portland
Harbor Managers Meeting on R2 Reporting

Below is a summary of outstanding "framework" issues identified by the LWG. I am also attaching our issue summaries and will forward our HHRA issue summary.

Eric

(See attached file: ERAFrameworkStatus.doc)(See attached file: ModelingProgress.doc)
----- Forwarded by Eric Blischke/R10/USEPA/US on 05/24/2006 08:39 AM

Keith Pine
<kpine@integralcorp.com>

05/19/2006 04:26

PM

Eric Blischke/R10/USEPA/US@EPA, Carl Stivers <cstivers@anchorenv.com>, lisas@windwardenv.com, Laura Kennedy <LauraKennedy@KennedyJenks.com>, Keith Pine <kpine@integral-corp.com>

To

Subject
RE: Identification of Outstanding
Issues for 5/23/06 Portland
Harbor Managers Meeting on R2
Reporting

Eric and Chip,

The LWG's take on the outstanding issues needing resolution for the Round 2 report is provided below. We have also included some issues that need clarification or where additional information is needed for us to move forward with Round 2 reporting and/or Round 3 scoping.

to move forward with Round 2 reporting and/or Round 3 scoping.

The Agency team is currently working on the filling in the details on the first draft of the weight-of-evidence (WOE) approach and lines-of-evidence (LOE) matrix. The Lower Willamette Group (LWG) has reviewed these drafts and agreed with the general approach which will be applied to the Round 2 Comprehensive report. Resolution is needed between the (LWG) and the Environmental Protection Agency (EPA) and its partners regarding the following: Ecological Risk Assessment:

* Transition zone water (TZW) risk characterization: TZW will be integrated into the LOE matrix table. LWG and EPA need to come to an agreement how to characterize ecological effects associated with TZW, and to develop a decision matrix of TZW risk outcome. LWG agrees to compare TZW to AWQC and/or other effects-based screening levels.

* Application of water screening levels: LWG and EPA need to resolve if water screening level values for the ecological risk assessment should be based on bioaccumulation values.

* Seep water exposure: LWG and EPA need to discuss which seeps to include in the ERA and for which receptors and exposure pathways. LWG agrees the seep water data can be compared to AWQC or other effects-based screening levels.

* Lines-of evidence: olfactory function in adult salmon - LWG does not agree olfactory-based TRVs should be used in the ecological risk assessment because (1) these TRVs can not be tied to survival, growth, and reproduction, and (2) this would be precedent setting. While we could include the TRVs and discuss the uncertainty in the risk assessment, it may cause a communication problem since this is more of a NRD issue.

* The scope and determination of the following proposed Round 3 data need resolution:

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* Additional biota sampling - LWG wants to wait to sample additional tissue data (e.g., sculpin, crayfish) following Rd 2 data evaluation. EPA has proposed collection additional fish tissue (northern pikeminnow, crappie, and largescale sucker) to increase sample size from Round 1 sampling and for use in the FWM. LWG team does not think additional tissue data proposed for the FWM (i.e., northern pikeminnow, crappie, and largescale sucker) will change the results of the FWM or are needed for remedial decisions. Further discussion between EPA and LWG is needed on the rationale of sampling these fish species to have a "sufficient sample size".

* Riparian soil sampling - The Agency team actually indicated that the proposed riparian soil sampling is sediment. From the technical perspective, if areas are mapped out, this may indicate need for a small number of new sediment or fish samples (LWG is not opposed to additional sediment collection). Further discussion is needed.

* Sampling of fish gut contents - LWG is under the understanding that the Agency team agrees we can look at current information (Chinook gut contents, work, clam tissue, multiplate tissue) to help refine the dietary model (as opposed to collecting gut tissue). However, if fish are collected, the agency team would like gut contents, regardless of the above evaluation. The LWG is not opposed to the collection of gut contents if additional fish are collected (following Rd2 data evaluation).

* Collection of fish lesion data - For any additional fish collected, LWG will document observations of lesions. However, resolution between LWG and EPA is needed on the interpretation of lesions.

PRE comments: Further clarification is needed for the

interpretation of lesions.

* PRE comments: Further clarification is needed for the LWG technical team on several PRE comments (e.g., development of data rules, TRV selection process.)

Food web model:

The following issues relate to development of the Arnot and Gobas FWM for use in the Round 2 Comprehensive Report only (other issues exist related to FS applications of the FWM and use of the FWM to identify data needs):

- * Chemicals to modeled: LWG has proposed PCBs (total and congeners), dioxins/furans, and DDTs because these chemicals have been detected commonly in LWR tissue and sediment samples and the Arnot and Gobas model is recommended for hydrophobic organics. EPI and its partners have proposed a longer list including individual PAHs and metals.
- PAHS and metals.

 Spatial scale: LWG proposes application of the model for the purposes of the RBCT development on a site wide scale (e.g. RM 2-11) using surface weighted average sediment chemical concentrations. This facilitates maximum use of available data. EPA and its partners have proposed application of the FWM at smaller spatial scales (i.e. 34 segments) for FS applications such as evaluating remedial alternatives.

as evaluating remedial alternatives.

* Model compartments: LWG needs clarification on the preferences of EPA and its partners for model compartments (e.g. species to be modeled and how they are grouped) and the implications of this for treatment of input data (e.g. percent lipids) and comparisons to empirical tissue chemistry data for model performance evaluation. (This may have implications for Round 3 data collections needs).

* Model performance goals and approaches to calibration:

Model performance goals and approaches to calibration:

LWG would like to come to agreement with EPA and its partners on specific performance goals for the model to be used for development of RBCTs (and ultimately PRGs). LWG proposes primary calibration of the model to be based on total PCBs. While performance may vary across chemicals, LWG would like to come to agreement with EFA and its partners on minimum model performance criteria for the application of the FWM for use in developing RBCTs.

* Programming: EPA and its partners commented that they would prefer the model be rewritten in VBA. Is the version provided by Jon Arnot (entirely in Excel) acceptable for application for the Round 2 Report?

Human Health Risk Assessment:

Items for Which Resolution is Needed

* Ingestion of bivalves: Decide whether to include ingestion of bivalves in the HHRA. If ingestion of bivalves is included, determine ingestion rates and exposure point concentrations (e.g., individual stations, site-wide) appropriate for Portland Harbor, as well as the species/data to be evaluated. * Drinking water pathway: Decide whether to include ingestion of surface water by residents and workers (i.e., drinking water) in the HHRA. If ingestion of surface water is included, determine exposure point concentrations (e.g., individual samples, transects, site-wide) appropriate for Portland Harbor.

* Screening of TZW (direct exposure): Decide whether to screen TZW against MCLs and/or tap water PRGs and determine point of compliance (e.g., TZW, near-bottom single point surface water samples, surface water exposure point concentrations).

* Screening of TZW (bioaccumulation): Decide whether screening of TZW against AWQC for fish consumption should supersede tissue data (i.e., if chemicals are not detected in fish tissue or do not pose unacceptable risk via fish consumption but concentrations in TZW exceed AWQC, are the chemicals considered

CONCENTRATIONS IN TIME exceed AWQC, are the chemicals considered COPCs for the risk assessment?).

* Additional biota sampling: While there may be other reasons for sampling biota (e.g., ECORA, FWM), decide whether additional biota samples are needed to complete the HHRA. If additional biota samples are needed, decide how data would be used in HHRA.

Items for Clarification/Additional Information Needed

* Riparian soils: Clarify whether the request for
riparian soil data includes the HHRA.

* Additional COIS (PBDES): Clarify how PBDE data would be
used to make cleanup decisions. * PBTs in breast milk: Provide proposed methodology for assessing PBTs in breast milk. * Diver scenario: Provide exposure assumptions to assess the diver scenario.

Modeling:

Reach final agreement on modeling methods/tools for each May 2 objective (i.e., matrix)
Clarify path forward and timing for resolving details of "Hybrid Model Approach" (i.e., integration, potential refinements of chemical F&T portion, and ability to identify data gaps in time for Round 3B)
Reach final agreement on use of the LWG Food Web Model (with revisions as necessary and required by EPA) for Round 2 Report PRG purposes

PRGs/AOPCs:

 * $\,$ Need clarification if any further discussion is required regarding PRG and AOPC methods for Round 2 Report as specified in Eco and FS Frameworks.

We look forward to seeing the Agencies' views on these outstanding issues and discussing these matters with you during our meeting on May

Regards, Keith

From: Keith Pine
Sent: Wednesday, May 17, 2006 2:53 PM
To: Blischke.Eric@epamail.epa.gov; 'Carl Stivers';
'lisas@windwardenv.com'; 'Laura Kennedy'
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'Taku Fuji'; 'hellea@windwardenv.com'; Gene Revelas; Ray Walton
(E-mail); Bill Locke; Nick Varnum
Subject: Identification of Outstanding Issues for 5/23/06 Portland
Harbor Managers Meeting on R2 Reporting

Hi tolks, In yesterday's EPA-DEQ-LWG managers meeting that followed the TZW framework meeting, we agreed that the 5/23 meeting would be attended only be the LWG managers rather than technical staff and that technical leads on both the agency side and LWG side of each key issue should develop a concise bulleted list of the remaining outstanding issues (and any clarifications still needed) for 1) the ecorisk framework, 2) human health risk issues, and 3) modeling issues. We suggested the following people would develop the lists separately for the agency team and the LWG:

Ecorisk framework: Lisa Saban and Joe Goulet

Human health: Laura Kennedy and Dana Davoli Modeling: Carl Stivers and Bruce Hope/Eric Blischke These lists should be circulated to the agency and LWG managers by COB Friday, 5/19. The managers will review the lists and work to reach consensus on the outstanding issues.

Thanks,

Keith Pine, P.G.

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This communication is made under the framework of the LWG Participation Agreement and in the parties' common interests in meeting LWG member obligations under the Administrative Order on Consent and in anticipation of litigation concerning liability for the Portland Harbor Superfund site. This communication is intended and believed by the parties to be part of an ongoing and joint effort to develop and maintain a common legal strategy and contains strategies, work product and legal advice within the "common interest" extension of the attorney-client privilege and the work product doctrine. This communication may include attorney-client communications. With respect to communications by private LWG members to public members, those communications are with the expectation that they will be kept confidential by the public entities. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (206) 957-0354, or by electronic mail at kpine@integral-corp.com.